



Intensity-Modulated Radiation Therapy (IMRT) Planning Services Editing

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This MLN Matters® Special Edition Article is for Outpatient Prospective Payment System (OPPS) providers submitting claims for outpatient Intensity-Modulated Radiation Therapy (IMRT) planning to Medicare Administrative Contractors (MACs).

WHAT YOU NEED TO KNOW

IMRT is a procedure that delivers radiation with adjusted intensity to preserve adjoining normal tissue. IMRT is provided in two treatment phases, planning and delivery. Medicare pays hospitals under the OPPS a bundled payment for the planning phase. The bundled payment covers a range of services that may be performed as part of developing an IMRT treatment plan. The bundled payment covers these services regardless of when they are billed.

This article provides a reminder to hospitals that bill for outpatient IMRT planning services to ensure that they bill correctly and avoid overpayments.

BACKGROUND

IMRT also known as conformal radiation, delivers radiation with adjusted intensity to preserve adjoining normal tissue. IMRT can deliver a higher dose of radiation within the tumor while delivering a lower dose of radiation to surrounding healthy tissue. IMRT is provided in two treatment phases, planning and delivery. The planning phase includes simulations.

When IMRT is furnished to beneficiaries in a hospital outpatient department that is paid under the hospital OPPS, hospitals must remember that CPT codes 77014, 77280, 77285, 77290, 77295, 77306 through 77321, 77331, and 77370 are included in the Ambulatory Payment Classification (APC) payment for CPT code 77301 (IMRT planning). You should not report these codes in addition to CPT code 77301, when provided prior to, or as part of, the development of the IMRT plan. The charges for these services should be included in the charge associated with CPT code 77301, even if the individual services associated with IMRT planning are performed on dates of service other than the date on which CPT code 77301 is reported.

ADDITIONAL INFORMATION

The Medicare Claims Processing Manual, Chapter 4, Section 200.3.1 contains instruction for IMRT services coding and those instructions are at <https://www.cms.gov/Regulations-and-Guidance/Guidance/Manuals/downloads/clm104c04.pdf>.

[CR9658](#), July 2016 Update of the Hospital Outpatient Prospective Payment System (OPPS), also contains these instructions for IMRT.

The Office of the Inspector General recently released a report on improper billing by hospitals for IMRT and that report is available at <https://oig.hhs.gov/oas/reports/region9/91602033.pdf>.

If you have questions, your MACs may have more information. Find their website at <http://go.cms.gov/MAC-website-list>.

DOCUMENT HISTORY

Date of Change	Description
March 16, 2021	We replaced an article link with a link to a related CR.
September 11, 2018	Initial article released.

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